



MANUFACTURING INDUSTRIAL COUNCIL

June 1, 2004

Ms. Allison Ray
AWV Project Office (Wells Fargo Building)
999 Third Avenue, Suite 2424
Seattle, WA 98104

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AWVSP Team Office

**Subject: SR 99: Alaskan Way Viaduct & Seawall Replacement Project DEIS
Comments from the Seattle Manufacturing Industrial Council**

Dear Ms. Ray:

We have reviewed the Draft Environmental Impact Statement prepared for the SR 99, Alaskan Way Viaduct & Seawall Replacement Project with respect to how it could affect the industrial areas of Seattle. The Manufacturing Industrial Council of Seattle (MIC) represents businesses in the Duwamish and Ballard Interbay Industrial (BINMIC) areas of Seattle. The "lifeline" linking these two areas is the Alaskan Way Viaduct.

We appreciate the efforts of WSDOT and City of Seattle staff to understand the issues affecting our constituents. Staff from both agencies have attended many MIC meetings and workshops. We trust that we will have continued opportunities to discuss detailed issues with the design team as a preferred alternative progresses into the next phase of design and construction planning.

Our comments regarding the project are detailed below. The MIC's comments primarily relate to our preferences and major design issues.

Regional Mobility

1. **The MIC strongly supports replacing the Alaskan Way Viaduct with a facility that, at a minimum, retains the existing regional traffic and freight mobility functions.** The Alaskan Way Viaduct is critical to continued economic success of both the Duwamish and BINMIC industrial areas. If it were to fail or be replaced with a facility that has less capacity, it would remove the primary freight link connecting these two areas. Total loss of capacity would also force tens of thousands of vehicles onto Interstate 5 and other surface streets through out Seattle, choking the ability to move freight into, out of, and through Seattle. Total loss of the facility could also significantly hamper freight rail movements to and through Seattle. The MIC supports alternatives that at least retain the existing capacity of the facility.
2. **The MIC does not support either the Surface or Bypass Tunnel Alternatives because they would reduce capacity of the corridor and impede access to Ballard/Interbay.** The DEIS shows that both of these alternatives would result in a loss of capacity, additional travel delay, and congestion particularly for trips destined to and from the BINMIC. These conditions are not acceptable to the MIC.
3. **Multiple routes for over-dimension cargo must be retained through Seattle.** Surface Alaskan Way is the major north-south route for over-dimension cargo in Seattle. However, other over-dimension routes are also critical and cannot be affected by the Viaduct project. These include Westlake Avenue, which is a primary over-dimension route to access Fremont and the South Lake Union area.

4. **The Viaduct should be considered as part of a regional system connecting to Interstate 5 at the south via SR 509.** The MIC is an ardent supporter of the SR 509 extension project because it provides additional north-south capacity between the Duwamish area and the Kent Valley. The Viaduct continues this access connection to the BINMIC area. It is along this spine that the vast majority of the entire Pacific Northwest's industrial businesses are located. The need for and benefits of this entire corridor, including the SR 509 extension, should be discussed in the FEIS.

Access for Ballard/Interbay

5. **The Western and Elliott Avenue ramps must be included in the preferred alternative.** These ramps provide the primary connection between BINMIC and the Viaduct corridor. If they are not included, all traffic destined to Ballard and Interbay would have to use surface Alaskan Way, which is not acceptable.

The design of the new ramps at Western and Elliott Avenues should improve on the conditions that exist today. Specifically, treatments that reduce the conflicts between truck traffic and pedestrian crossings at the head of each ramp should be included. Increased capacity for the southbound on-ramp traffic should also be evaluated to reduce the queuing that now occurs on southbound Elliott Avenue. If possible, pedestrian movements could be relocated to pass under the ramp to completely eliminate the conflict. Alternatively, the design could consider a dual right turn onto the ramp merging to one lane after the pedestrian crossing.

6. **The Preferred Alternative should be designed to retain the Broad Street underpass in the Mercer Corridor improvements.** According to the City of Seattle's *Mercer Corridor Project March Newsletter*, both of the two alternatives being considered for the Mercer Corridor retain the Broad Street underpass. Loss of this underpass could cause severe congestion and delay for traffic traveling from Interstate 5 to the Elliott Avenue corridor and on to BINMIC. Broad Street is part of the major east-west truck corridor and one of the only routes that allows trucks to bypass the Seattle Center. The Preferred Alternative should retain this important facility.
7. **The FEIS should define alternate routes for flammable and hazardous materials transport, if either the Tunnel or Bypass Tunnel Alternatives are selected.** The DEIS states that flammable and hazardous (including combustible) materials are and would continue to be prohibited in the Battery Street Tunnel for all alternatives. It also states that, for the Tunnel and Bypass-Tunnel Alternatives, flammable and hazardous materials could be prohibited in tunnel sections. Since flammable materials are currently permitted on the existing viaduct and since hazardous materials are permitted during off-peak hour, the FEIS should provide analysis and discussion about alternative routes for and impacts of removing these trips. Alternative routes should be designated and where necessary, appropriate mitigation (such as signage and turn radii improvements) should be identified.

Access for Duwamish Industrial Area

8. **The MIC supports alternatives that provide new ramps/access at SR 519.** Providing access to SR 519 will not only improve freight mobility to the northern section of the Duwamish, it will also reduce traffic on other key north-south arterials in the Duwamish such as 1st and 4th Avenues S.
9. **The Preferred Alternative should allow for increased capacity on SR 519.** The Preferred Alternative for the Alaskan Way Viaduct should not preclude the ability to increase east-west capacity in the SR 519 corridor between the waterfront and Interstate 5/Interstate 90. Analysis in the DEIS shows that concentrating east-west travel into just the Atlantic Street corridor would cause the intersection of Atlantic

Street/1st Avenue S to fail. Expansion of this intersection is nearly impossible because of the location of Safeco Field and the parking garage on the opposite side of the street. In addition, eastbound traffic between the waterfront and 4th Avenue is often prohibited before and after Mariner's games. Therefore, the MIC requests that the preferred alternative maximize east-west capacity in this corridor by providing multiple connections (to both Atlantic Street and Royal Brougham Way), and by not precluding an eventual one-way couplet as originally proposed for this corridor.

Construction Impacts

Most of the negative impacts of the Viaduct project relate to road closures or delays during construction. Construction impacts would severely affect businesses in BINMIC because they frequently use this corridor. Construction impacts throughout the Duwamish would primarily be related to additional traffic congestion along parallel routes caused by construction closures or delays.

10. **Long-term closure of the Viaduct during construction is unacceptable.** Although not discussed in the DEIS, we understand that some review is proceeding related to long-term closure of the Viaduct to speed up the construction process. Most of our constituent industrial businesses plan in a 10-year horizon. If the Viaduct were to be closed for long periods of time, some businesses may opt to relocate or expand outside of the Seattle area. Seattle may never recover from the loss of these businesses. Therefore, the preferred alternative must be constructed in a way that minimizes closure of the Viaduct. If the Viaduct or its access ramps must be eliminated for periods longer than 3 months, then suitable detour routes that provide nearly equivalent travel time from freight movements must be provided. Although closing the Viaduct may reduce the overall cost of the project, the economic impact to businesses in Seattle should be considered when selecting a Preferred Alternative.
11. **The FEIS must thoroughly evaluate truck detours and alternative routes during construction.** Based on the DEIS, construction of three of the alternatives would close the Elliott Avenue/Western Avenue ramps to the SR-99 corridor for between 24 months and 114 months. However, the detour routes discussed in the DEIS are unacceptable to BINMIC, and few alternatives exist. For example, the detour route for trucks along Alaskan Way would have only one lane in each direction; Interstate 5 is already heavily congested for much of the day; and trucks larger than 27 feet are currently prohibited from Downtown Seattle streets north of King Street between 6:00 A.M. and 6:00 P.M. Therefore, it is imperative that alternative truck routes that provide nearly equivalent travel time to the BINMIC be provided if the Elliott/Western Avenue ramps are closed for long periods of time.
12. **Construction planning must more thoroughly coordinate with other major projects, not just the Monorail project.** Page 291 of the Transportation Discipline Report notes that the Seattle monorail project is not expected to be complete until 2009 and the viaduct construction could begin in 2008. During 2008 and 2009 "there could be a short period where there are possible conflicts with project traffic detour plans and other construction processes." There could be a plethora of other transportation construction projects occurring during this period including projects on Interstate 5, City of Seattle streets, Sound Transit light rail or commuter rail lines, and the Washington State Ferries terminals. Detailed planning among all potential stakeholders should be evaluated during subsequent phases of project development to identify conflicts among all construction projects and identify appropriate mitigation strategies.
13. **Adequate funding for temporary traffic control and police officer control must be included in the construction budgets.** The Seattle Police Department provides the most effective temporary traffic control when manned flaggers are required. The efficiency of this traffic control increases if the same personnel can be used every day because they become familiar with traffic flow and the influence of upstream or downstream intersection operations. Recent budget cuts and/or the effect of multiple construction projects in Seattle may affect the quality of traffic control that can be provided during

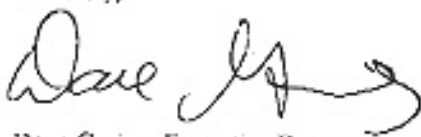
construction. Adequate budget should be included in the project to fund trained police staff for these traffic control functions.

14. **The FEIS should document impacts to other east-west corridors in Seattle, particularly during construction.** The DEIS does not adequately document the potential impacts to major east-west arterial routes throughout Seattle for each alternative nor during construction. The DEIS does disclose that the potential loss in capacity, change in access points, and added travel time along the SR-99 corridor will shift trips (including truck trips from the BINMIC areas) toward the east onto Interstate 5 or other north-south Seattle arterials. The Final EIS should document the impacts of these potential shifts on the major east-west arterial routes such as Spokane Street, Lander Street, SR-519, Mercer/Roy Corridor, Nickerson Street, Leary Way, and N 39th Street. It should also identify mitigation to accommodate these impacts.

Flexible Transportation Package

15. We understand that freight-related items may be included in the Flexible Transportation Package that would be implemented during construction to relieve congestion. Freight-related items that may be appropriate for this package include:
- Do not restrict the hours in which freight can move through the system. The logistical constraints with coordinating all deliveries, loading, and unloading only during nighttime hours simply make this ineffective and often not feasible.
 - Radio alerts and e-mail dispatches related to construction delays, lane closures, and alternative routes.
 - Designated truck routes or lanes along roadways with acceptable grades, intersection turn radii, and clearance (lateral and vertical). The truck routes should include both north-south alternatives and east-west routes. Improvements may be required in some locations to provide lateral or vertical clearance.
 - Designated truck routes for flammable, hazardous, and combustible materials during times when the viaduct and/or surface Alaskan Way are not available.
 - Alternate over-dimension routes during times when surface Alaskan Way is not available.
 - All project construction detours and truck route planning should consider other construction projects throughout Seattle. Projects along I-5, on City streets, at the Ferry Terminals, and on other major state routes should be coordinated with the viaduct construction and communication plan.

Sincerely,



Dave Gering, Executive Director
Manufacturing Industrial Council of Seattle